

Exhibit 2

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

LTL MANAGEMENT LLC,

Plaintiff,

v.

DR. THERESA SWAIN EMORY, DR.
RICHARD LAWRENCE KRADIN, AND
DR. JOHN COULTER MADDOX

Defendants.

DOCKET NO.: 3:23-CV-03649-MAS-
RLS

CIVIL ACTION

DECLARATION OF DR. JOHN C. MADDOX, MD

Dr. John C. Maddox, MD hereby declares under penalty of perjury as follows:

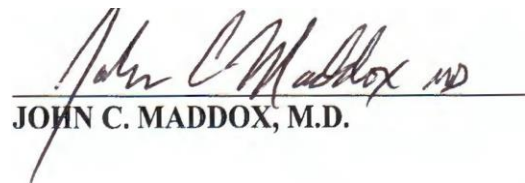
1. I am over eighteen (18) years of age and have personal knowledge of, and am competent to testify to, the matters set forth in this Declaration.
2. I am a part-time employee of Peninsula Pathology Associates PC based in Newport News, Virginia, which is my principal place of business.
3. I currently reside in Virginia and have resided there since 1980.
4. I am a board-certified physician in anatomic and clinical pathology as well as hematopathology. I am licensed to practice medicine in the state of Virginia. I am not licensed to practice medicine outside of Virginia.
5. I have never resided in New Jersey, and have never practiced medicine in New Jersey.
6. I do not own or lease any real property in New Jersey, and do not hold any bank accounts in New Jersey.
7. I co-authored a peer-reviewed article entitled "Malignant mesothelioma following repeated exposures to cosmetic talc: A case series of 75 patients," which was subsequently

published in March 2020 in the American Journal of Industrial Medicine (the “Article”).

8. I researched and drafted the Article while residing in Virginia.

9. When I researched and drafted the Article and submitted it to the Journal for publication, I did so with the hopes it would be published nationally, and not in any particular state.

Executed on September 12, 2023.



JOHN C. MADDOX, M.D.